

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JONATHAN BARAM, an Individual,

Case No. 1:23-cv-01758 (ER)

Plaintiff,

-against-

JANE DOE, an Individual; DiCELLO
LEVITT fka DiCELLO LEVITT GUTZLER,
a Law Firm; THE HABA LAW FIRM, P.A.,
a Law Firm; FARZIN FRANKLIN AMANAT,
ESQ., an Individual; GREG GARRELL
GUTZLER, ESQ., an Individual; and
LISA HABA, ESQ., an Individual,

Defendants.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support, and upon the pleadings and proceedings had herein, Defendants, DiCello Levitt LLP (“DL Firm”); F. Franklin Amanat, Esq. (“Amanat”); Greg Garrell Gutzler, Esq. (“Gutzler”); The Haba Law Firm, P.A. (“Haba Firm”); and Lisa Haba, Esq. (“Haba”) (collectively, the “Attorney Defendants”), will move this Court, before the Honorable Edgardo Ramos, at the United States District Court for the Southern District of New York, at the courthouse located at Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, New York 10007, for an Order:

- (i) pursuant to Fed. R. Civ. P. 12(b)(3), 12(b)(6) and 9(b), dismissing Plaintiff Jonathan Baram’s Complaint; and
- (ii) granting the Attorney Defendants such other and further relief as the Court deems just, proper and equitable.

PLEASE TAKE FURTHER NOTICE that, by Order of the Court dated June 21, 2023, any opposing declaration(s), affidavit(s) and/or answering memorandum shall be served on or by August 2, 2023, and reply declaration(s), affidavit(s) or memorandum shall be served on or by August 9, 2023.

Dated: Woodbury, New York
July 12, 2023

KAUFMAN DOLOWICH & VOLUCK, LLP



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Attorneys for Defendants
DiCello Levitt Gutzler LLC; The Haba Law Firm, P.A.; Farzin Franklin Amanat, Esq.; Greg Garrell Gutzler, Esq.; and Lisa Haba, Esq.

To: All Appearing Parties (*via ECF Only*)